



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: John Duffy
DOCKET NO.: 23-20552.001-R-1
PARCEL NO.: 15-12-110-045-0000

The parties of record before the Property Tax Appeal Board are John Duffy, the appellant, by attorney Dora Cornelio, of Schmidt Salzman & Moran, Ltd. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **No Change** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$19,695
IMPR.: \$93,223
TOTAL: \$112,918

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2023 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property consists of a two-story dwelling of masonry exterior construction with 3,972 square feet of living area. The dwelling is approximately 112 years old. Features of the home include a full basement, central air conditioning, three fireplaces, 3 full and 1 half bathrooms and 3-car garage. The property has a 15,150 square foot site and is located in River Forest, River Forest Township, Cook County. The subject is classified as a class 2-06 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends assessment inequity with respect to the improvement as the basis of the appeal. In support of this argument the appellant submitted information on five equity comparables located within the subject's assessment neighborhood, with one comparable located on the same street as subject. The comparables are composed of class 2-06 two-story dwellings of frame, masonry, or frame and masonry exterior construction, ranging in size from 3,781 to

4,355 square feet of living area. The homes are approximately 69 to 162 years old. Each property has 2 to 4 full bathrooms, with one comparable having an additional 1 half bathroom, and a 2-car to 3-car garage. Four comparables feature one fireplace, three comparables have a full basement, and two comparables have a slab foundation. Three comparables each include central air conditioning. The comparables have improvement assessments that range from \$70,370 to \$88,965 or from \$18.61 to \$21.27 per square feet of living area. Based on this evidence, the appellant requested the subject's improvement assessment be reduced to \$78,089 or \$19.66 per square foot of living area.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$112,918. The subject property has an improvement assessment of \$93,223 or \$23.47 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on four equity comparables located within the subject's assessment neighborhood and within .25 of a mile from subject or subarea. One comparable is located on the same street as subject. The comparables are composed of class 2-06. two-story dwellings of stucco or masonry exterior construction ranging in size from 3,495 to 3,797 square feet of living area. The comparables are approximately 87 to 127 years old. Each comparable has a full basement, 3 to 5 full bathrooms, with all comparables featuring an additional 1 half bathroom, central air conditioning, one or two fireplaces, and a 2-car or 3.5-car garage. The comparables have improvement assessments that range from \$98,430 to \$117,467 or \$26.12 to \$32.00 per square feet of living area. Based on this evidence, the board of review requested confirmation of the subject's assessment.

Conclusion of Law

The taxpayer contends assessment inequity as the basis of the appeal. When unequal treatment in the assessment process is the basis of the appeal, the inequity of the assessments must be proved by clear and convincing evidence. 86 Ill.Admin.Code §1910.63(e). Proof of unequal treatment in the assessment process should consist of documentation of the assessments for the assessment year in question of not less than three comparable properties showing the similarity, proximity and lack of distinguishing characteristics of the assessment comparables to the subject property. 86 Ill.Admin.Code §1910.65(b). The Board finds the appellant did not meet this burden of proof and a reduction in the subject's assessment is not warranted.

The parties submitted a total of nine equity comparables to support their respective positions before the Property Tax Appeal Board. The Board gives reduced weight to appellant's comparables #2, #4 and #5, and the board of review's comparable #1 and #3 for lack of a basement foundation or garage amenity, which are features of the subject property, and/or for a significant difference in age from subject.

The Board finds the best evidence of assessment equity to be the appellants' comparables #1 and #3 and the board of review's comparables #2 and #4, which are more similar to the subject in dwelling size, age, basement amenity, and garage amenity. However, the comparables have varying degrees of similarity to the subject in garage size or central air conditioning feature, as well as other features, suggesting adjustments would be required to make the comparables more equivalent to the subject. Nevertheless, the comparables have improvement assessments that

range from \$70,370 to \$110,786 or from \$18.61 to \$30.10 per square foot of living area. The subject's improvement assessment of \$93,223 or \$23.47 per square foot of living area falls within the range established by the best comparables in the record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, the Board finds the appellant did not demonstrate with clear and convincing evidence that the subject's improvement was inequitably assessed and a reduction in the subject's assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date:

May 19, 2026



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

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